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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

EUGENE DIVISION

UNITED STATES OF AMERICA,

6:23-mc76

Plaintiff,

v.

**UNOPPOSED MOTION TO
EXTEND 90-DAY PERIOD
PURSUANT TO
18 U.S.C. § 983(a)(3)(A)**

**IN THE MATTER OF \$402,740.00 U.S.
CURRENCY, et al., *in rem*,**

Defendants.

Pursuant to Local Rule 7-1, counsel for the United States certifies that I have contacted Jay W. Frank, attorney for claimant Robert Edward Jones, who concurs with this extension.

On October 31, 2022, Robert Edward Jones filed a claim in a non-judicial civil forfeiture proceeding by the Drug Enforcement Administration to the following:

- \$402,740.00 U.S. Currency,
- Assorted (4,696) Silver Coins, (70) Gold Coins, (84) Silver Bars and (43) Gold Bars,
- 2012 Dodge Ram 3500 Truck with 2014 Transfer Flow In-Bed Auxiliary Diesel Fuel Tank VIN: 3C63DRJL0CG262204, its tools and appurtenances,

- PJ 5th Wheel Low Pro Flatbed Trailer with Ramp, VIN: 289320300, its tools and appurtenances,
- Kubota SVL95-2S Track Skid Steer, its tools and appurtenances,
- Kubota KX040-4 Excavator, its tools and appurtenances,
- 2016 Load Trail Tilt Deck Trailer, VIN: 4ZETD2028G1110437, its tools and appurtenances,
- 2020 Dodge Commercial Ram 3500 Truck, VIN: 3C7WRTCL3LG110390, its tools and appurtenances,
- Carry-On Trailer Corp. Patriot Dump Trailer, VIN: 4YMBD1429JR000541, its tools and appurtenances,
- 2020 MultiQuip QP-2TH Water Pump with Trailer, its tools and appurtenances, and
- JCB 8035ZTS Compact Excavator, its tools and appurtenances,

seized from Robert Edward Jones on or about August 17, 2022.

No other person filed a claim in the administrative forfeiture proceeding.

As provided in 18 U.S.C. § 983(a)(3)(A), the United States and Robert Edward Jones, agree to extend the time in which the United States will file a complaint for forfeiture against:

- \$402,740.00 U.S. Currency,
- Assorted (4,696) Silver Coins, (70) Gold Coins, (84) Silver Bars and (43) Gold Bars,
- 2012 Dodge Ram 3500 Truck with 2014 Transfer Flow In-Bed Auxiliary Diesel Fuel Tank VIN: 3C63DRJL0CG262204, its tools and appurtenances,
- PJ 5th Wheel Low Pro Flatbed Trailer with Ramp, VIN: 289320300, its tools and appurtenances,
- Kubota SVL95-2S Track Skid Steer, its tools and appurtenances,

- Kubota KX040-4 Excavator, its tools and appurtenances,
- 2016 Load Trail Tilt Deck Trailer, VIN: 4ZETD2028G1110437, its tools and appurtenances,
- 2020 Dodge Commercial Ram 3500 Truck, VIN: 3C7WRTCL3LG110390, its tools and appurtenances,
- Carry-On Trailer Corp. Patriot Dump Trailer, VIN: 4YMBD1429JR000541, its tools and appurtenances,
- 2020 MultiQuip QP-2TH Water Pump with Trailer, its tools and appurtenances, and
- JCB 8035ZTS Compact Excavator, its tools and appurtenances,

or to obtain an indictment alleging that the assets are subject to forfeiture. Robert Edward Jones agrees that the deadline by which the United States shall be required to file a complaint for forfeiture against the property and/or to obtain an indictment alleging that the property is subject to forfeiture shall be extended to Tuesday, February 28, 2023.

Robert Edward Jones agrees that until the United States files a complaint for forfeiture against the assets and/or obtains an indictment alleging that the assets are subject to forfeiture, or until February 28, 2023, or until the parties reach a settlement regarding the property, whichever occurs first, the property shall remain in the custody of the United States and Robert Edward Jones shall not seek its return for any reason in any manner.

DATED: January 26, 2023

Respectfully submitted,

NATALIE K. WIGHT
United States Attorney

s/ Amy E. Potter
AMY E. POTTER
Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that I have made service of the foregoing Motion to Extend 90-Day Period
and a proposed Order on the party herein by sending via email on January 26, 2023, to:

Jay W. Frank
raccoonmon@hotmail.com
Attorney for claimant Robert Edward Jones

s/ Dawn Susuico
DAWN SUSUICO
Paralegal